

EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET - SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230
Fax (212) 571-5507

BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196

November 21, 2024

Hon. Colleen McMahon
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Filed on ECF

United States v. Emmanuel Torres
24 Cr. 474

Dear Judge McMahon:

We represent Emmanuel Torres pursuant to the Criminal Justice Act. He is out on bail and his travel is currently restricted to the Eastern and Southern Districts of New York. We write to respectfully request a temporary modification to his bail conditions to allow him to travel to Meriden, Connecticut to visit his brother over the Thanksgiving holiday from Monday November 25th to Friday November 29th. Since he has been out on bail he has previously travelled to Connecticut to spend time with his brother without incident. We have reached out to both pretrial services and the Government to discuss this request, and neither has any objection.

Respectfully submitted,
Sarah M. Sacks